REMARKS/ARGUMENTS

The Examiner is thanked for the interview conducted on Thursday, December 29, 2006.

By this amendment, Claims 1, 2, 4, 6, 34-36 are amended. Claim 33 is cancelled. No new claims have been added. Hence, Claims 1-32 and 34-36 are pending in the application.

The amendments to the claims as indicated herein do not add any new matter to this application. Furthermore, amendments made to the claims as indicated herein have been made to exclusively improve readability and clarity of the claims and not for the purpose of overcoming alleged prior art.

Each issue raised in the Office Action mailed October 24, 2006 is addressed hereinafter.

I. TELEPHONE INTERVIEW

Representatives of the Applicants thank Examiner Rose for the telephone interview conducted on December 29, 2006. In the interview, Representatives of the Applicants explained Claim 1 in detail, in addition to the claim term "dimension value." No agreement was reached.

II. REJECTION BASED ON THE CITED ART

Claims 1-37 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,457,000 to Witkowski et al. ("*Witkowski*").

A. OVERVIEW OF *WITKOWSKI*

Witkowski describes a method that is performed by a database server to access one or more previous rows of data (relative to a current row of data) (col. 2, lines 25-26). The server stores each previously generated row into a buffer and finds a previously generated row in the

buffer when access to that row is required (col. 2, lines 42-44). According to the described method, the invention of *Witkowski* "eliminates the number of operations, such as self-joins, that are required in order to create a table that includes current column values derived from rows that have been previously processed" (col. 2, line 67 – col. 3, line 3). This efficiency is achieved by utilizing an offset included in a statement to indicate where a previous row is located (col. 3, lines 3-5).

B. CLAIM 1

Claim 1 is completely unrelated to *Witkowski*. *Witkowski* mentions nothing about "dimensions" and "dimension values." *Witkowski* is also silent with respect to determining where, **within a unit of contiguous storage,** to store a row. Furthermore, *Witkowski* does not disclose how, in response to receiving a SQL query that requires access to a row, a row is accessed using a dimension-value combination that is indicated in a request, much less that the dimension-value combination is used to calculate a value that represents where the corresponding row is stored.

Present Claim 1 recites:

A machine implemented method comprising:
accessing rows in a database table, wherein:
each row in the table corresponds to a dimension-value combination;
a database system defines, for said database table, a dimension column that contains dimension values;
each row in the table is stored in a unit of contiguous storage; and
a location within a unit of contiguous storage at which each row is stored is determined based on the dimension-value combination to which the row corresponds; and
wherein the accessing of the rows also includes, in response to receiving a request that indicates a particular dimension-value combination:

using the particular dimension-value combination for calculating a value that represents the unit of contiguous storage that stores a particular row that corresponds to the particular dimension-value combination; and

using the value to access the particular row.

At least the above-bolded features of Claim 1 are not taught or suggested by *Witkowski.*

1. Witkowski *fails to disclose the recited "value"*

As was indicated in the telephone interview, present Claim 1 makes it clear that the **value** that represents the unit of contiguous storage that stores the requested row **is used to access the particular row**. The value may be a disk address in which a segment starts (see, e.g., paragraph [0045] and FIG. 4B of the present application). On page 16, line 3, the Final Office Action seems to equate the value in a cell of the buffer of *Witkowski* (e.g., $500 is value in c_sum[1]) with the "value" recited in Claim 1 and the cell itself with "unit of contiguous storage" recited in present Claim 1. However, the $500 value of *Witkowski* is **not used** to access c_sum[1], much less access a row **within** c_sum[1]. To assert that $500 is used to access c_sum[1] does not make sense.

2. Witkowski *fails to disclose "a location within a unit of contiguous storage at which each row is stored is determined based on the dimension-value combination to which the row corresponds"*

Present Claim 1 has been amended to recite "unit of contiguous storage" in place of "block" to clarify what Applicants meant by the term.

The Final Office Action seems to equate the "block" of previous Claim 1 with the buffer or table 260 of *Witkowski* (Final Office Action, page 3) **and** a specific cell in the buffer or table (Final Office Action, page 14-15). Either correlation does not make sense when trying to correlate other features of Claim 1 with *Witkowski.* Based on the first correlation

(block = buffer or table), the location within the buffer of *Witkowski* at which a row is stored is based on **when the row was created, not** based on the dimension value combination to which the row corresponds. Based on the second correlation (block = specific row in a table or cell in a buffer), it would have to follow that a location ***within*** a row or cell is determined. However, such a statement also does not make sense.

In the Response to Arguments section, the Final Office Action cites a description of the columns and values of table 300 (col. 8, lines 26-35) for teaching "a location within a block [now, unit of contiguous storage] at which each row is stored is determined based on the dimension value combination to which the row corresponds." Representatives for the Applicants are unclear how such a description relates to **determining, based on a dimension-value combination, a location** within a unit of contiguous storage at which a row is stored, especially since col. 8, lines 26-35 is silent as to any sort of determination and *Witkowski* is silent with respect to "dimensions" and "dimension values."

Based on the foregoing, *Witkowski* fails to teach or suggest numerous features of present Claim 1. Removal of the 35 U.S.C. § 102(e) rejection with respect to Claim 1 is respectfully requested.

C. CLAIM 34

Present Claim 34 recites:

> A computer-readable medium that is readable by a database system, having stored therein at least:
>
> a database table containing data items on the computer readable media that corresponds to locations associated with at least one dimension value;
>
> wherein said database system defines a dimension column for said database table that contains dimension values;

wherein the data items are stored in units of contiguous storage in an order dictated by the dimension values to which the data items correspond; and

wherein the database table does not store values for the dimension column.

At least the above-bolded features of Claim 34 are not taught or suggested by *Witkowski*.

1. Witkowski *fails to disclose "wherein the database table does not store values for the dimension column"*

In rejecting Claim 34, the Final Office Action referred to the rejection of Claim 2 that recites "the table does not include columns for storing values for the one or more dimensions." The Final Office Action cited column 8, lines 26-35 of *Witkowski* for disclosing this feature. However, that portion states:

> The **first column (day) would store values** corresponding to the day number (e.g., first day, second day, third day, etc.), **the second column (sales) would store values** corresponding to the total receipts for the corresponding day, and **the third column would store values** corresponding to the cumulative sum over the selected days. In addition, the table would be ordered, in ascending order, based on the day so that the values in the c_sum column can be meaningfully interpreted. (emphasis added).

Even if the day column, the sales column, and the c_sum column could be equated to a dimension column, no where does *Witkowski* teach or suggest that those columns **do "not store** values for the dimension column" as recited in Claim 34. In fact, the cited portion of *Witkowski* (as illustrated by the added emphasis) **teaches away** from this feature because each column ***stores*** values.

Based on the foregoing, *Witkowski* fails to teach or suggest numerous features of present Claim 34. Removal of the 35 U.S.C. § 102(e) rejection with respect to Claim 34 is respectfully requested.

D. DEPENDENT CLAIMS

The remaining claims not discussed thus far are dependent claims, each of which depends (directly or indirectly) on one of Claims 1 and 34 discussed above. Each of the dependent claims is therefore allowable for the reasons given above for the claim on which it depends. In addition, each of the dependent claims introduces one or more additional limitations that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case, a separate discussion of those limitations is not included at this time. The Applicant reserves the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

III. CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,
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on January 23, 2007 by 
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